

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

UNITED STATES OF AMERICA,

CR 19-30093-03-RAL

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

ROXANNE LYNETTE SAZUE,

Defendant.

The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense(s) to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

Beginning on a date unknown, but no later than on or about April 2014 through on or about May 2016, in the District of South Dakota, the Defendant, ROXANNE LYNETTE SAZUE, did embezzle, steal, willfully misapply, willfully permit to be misapplied, and convert to her own use more than \$1,000 of monies, funds, credits, goods, assets, and other property belonging to the Crow Creek Sioux Tribe, an Indian Tribal Organization, and did aid and abet others in committing the offense, all in violation of 18 U.S.C. §§ 2 and 1163. Among others, Defendant ROXANNE LYNETTE SAZUE aided and was aided by Roland Robert Hawk, Sr., Francine Maria Middletent, and Jacquelyn Ernestine Pease.

ROXANNE LYNETTE SAZUE was an elected member of the Crow Creek Sioux Tribe's Council from May 2014 through April 2016. During that time period, Defendant served as the Tribe's Chairperson. Defendant's offense

conduct involved her receipt of more than \$15,000 but not more than \$40,000. The money received derived from the CCST's General Welfare Account. Defendant was not entitled to that money, and her receipt of that money was unlawful.

RONALD A. PARSONS, JR.
United States Attorney

9/3/19
Date

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8-28-19
Date

Roxanne Lynette Sazue
ROXANNE LYNETTE SAZUE
Defendant

8-29-19
Date

Margo D. Northrup
MARGO D. NORTHRUP
Attorney for Defendant